



Facility Fact Sheet

Holcim (US) Inc./Geocycle LLC Facility
200 Safety Street
Holly Hill, Orangeburg County, South Carolina 29059

Draft Hazardous Waste Permit
Facility ID SC 003 368 891

The South Carolina Department of Health and Environmental Control (SCDHEC) has written a draft Hazardous Waste Permit Class 3 modification for the Holcim (US) Inc./Geocycle LLC facility (Holcim/Geocycle and/or the facility) located in Holly Hill, South Carolina.

The draft permit has been written to comply with the South Carolina Hazardous Waste Management Regulations and the Federal Resource Conservation and Recovery Act (RCRA), as amended by the Hazardous and Solid Waste Amendments. The hazardous waste permit administered by SCDHEC in conjunction with the HSWA permit issued by the U.S. Environmental Protection Agency (EPA) constitutes the full RCRA permit.

If approved, the permit modification will allow the facility to add treatment of liquid hazardous wastes to the precalciner portion of the currently permitted industrial furnace (aka Portland cement kiln system). EPA has also written a draft permit for the same activity. The proposal is based on there being no increase in the permitted hazardous waste derived fuel (HWDF) feed rate to the Portland cement kiln system. The draft permit will continue to be protective of human health and the environment.

This fact sheet explains SCDHEC's hazardous waste permitting process and the conditions of the draft permit.

SCDHEC and EPA will hold a public information availability meeting to discuss the draft permits with interested citizens. For more information, please refer to Section V.

I. Hazardous Waste Permitting Process

SCDHEC, with assistance from EPA, regulates hazardous waste activities at permitted facilities in South Carolina.

The permitting process enables SCDHEC, EPA

and other government agencies to evaluate the ability of a facility to comply with state and federal regulations.

After a hazardous waste permit application is received and determined to be complete, SCDHEC writes a draft permit containing all

conditions that the facility must meet.

Interested citizens are given sixty days to review and comment on the facility's permit application and the draft permit before SCDHEC makes a final permit decision.

SCDHEC and EPA will hold a public information availability meeting on **January 27, 2015**, to discuss the draft permits with interested citizens. Refer to **Section V** for more information concerning this meeting.

SCDHEC encourages all interested persons to participate in the permitting process.

II. Facility Description

Holcim (US) Inc. (Holcim) is the owner of a cement manufacturing facility located in Orangeburg County south of the town of Holly Hill, South Carolina on Highway 453. The facility also includes hazardous waste storage, treatment, and energy recovery operations, which is operated by Geocycle LLC. Holcim and Orangeburg County own approximately 3700 acres of land at the location where the facility is operated. The facility boundary includes multiple parcels of property, which are owned by either Holcim or Orangeburg County. The parcel owned by Orangeburg County is the result of a fee in lieu of tax (FILOT) arrangement with Holcim. (*NOTE: The approximate boundary of the facility is depicted in Appendix G – Facility Boundary Map of the draft permit.*)

Since 1987, the facility has used liquid Hazardous Waste Derived Fuel (HWDF) for energy recovery in its cement production facility. The HWDF is used as a supplement fuel to replace fossil fuels and is burned to recover energy that is used for the manufacturing of cement clinker. HWDF is a blend of various waste solvents, oils, out-of-specification intermediates, and products from various industries such as paints, inks, adhesives, resins, plastics, petroleum, petrochemical, pharmaceutical, automotive, and numerous chemical manufacturing and

process industries.

In October 2011, the facility applied for a Class 3 permit modification of its hazardous waste permit. The proposal is to add treatment of liquid hazardous wastes to the precalciner portion of the permitted industrial furnace (aka Portland cement kiln system). The precalciner portion of the combustion unit currently uses non-hazardous liquid and solid wastes for energy recovery. The facility already has approval to use HWDF for energy recovery in the lower (hot) end of the rotary kiln portion of the Portland cement kiln system. The proposal is based on there being no increase in the permitted HWDF feed rate to the Portland cement kiln system. Separate approval from SCDHEC's Bureau of Air Quality (BAQ) is also required before construction can begin. This separate approval was granted by BAQ by issuance of Construction Permit No. 1860-0005-DO in 2012.

III. Facility's Hazardous Waste Permit History

A RCRA HSWA Permit was originally issued to Holnam/Safety Kleen Corporation on March 22, 1990. The RCRA Permit was renewed when a RCRA Hazardous Waste Permit was issued to Holcim (US) Inc/Energis LLC on February 19, 2003. SCDHEC renewed the hazardous waste permit on April 16, 2013 with an expiration date of April 16, 2023.

RCRA hazardous waste permits are effective for ten-year periods.

IV. Draft Permit Requirements

There will be **no new hazardous waste activities at the facility** as a result of the draft permit. If issued, the permit will allow the facility to begin construction of piping, pumps and other ancillary equipment related to feeding HWDF to the precalciner portion of the Portland cement kiln system. After construction is completed, a test of the new system – similar to a trial burn – will be conducted as a Comprehensive Performance

Test (CPT). The CPT will determine whether the air emissions from the modified system continue to comply with Maximum Achievable Control Technology (MACT) standards for hazardous air pollutants. Please note, the draft permit does not allow any increase in the permitted feed rate of HWDF to the kiln system.

Other changes include the removal of certain permit conditions addressing air emissions, which are now governed under Holcim's Title V Operating Permit. The module for groundwater requirements (previously Module VII) is being removed since the requirements were specific to SWMU 14 and are duplicative to the approved Corrective Measures Study (CMS) Report for SWMU 14. Also, as a result of the aforementioned FILOT arrangement with Holcim, Orangeburg County meets the definition of "owner" as defined in R. 61-79.260.10 and therefore will now be listed on the hazardous waste permit as an owner. However, Holcim/Geocycle will continue to serve as the primary contacts for RCRA activities.

A brief outline of the draft permit conditions is provided in the attached table. The only section in the draft permit with these proposed revisions is Module V "Industrial Furnace". A table that summarizes all modifications to the draft permit can be found on page 3 of the draft permit (after the Table of Contents).

V. Public Participation

The permit application and draft permit are available for public review and comment from **December 5, 2014 through February 2, 2015**. SCDHEC placed a public notice in *The State* newspaper, announcing the beginning of the public comment period.

SCDHEC and EPA will hold a public information availability meeting to discuss the draft permits with interested citizens. The public meeting will be held on **January 27, 2015 from 6 p.m. to 8 p.m.**, at the Holly Hill Depot located at 8603 Old State Road in Holly

Hill, South Carolina. Interested persons may come by at any time during this public information availability meeting to ask questions or discuss concerns about the draft permits.

Written comments must be submitted no later than **February 2, 2015**, and should be addressed to Mr. David M. Scaturo, P.E./P.G., at the following address:

SC DHEC
Bureau of Land and Waste Management
2600 Bull Street
Columbia, SC 29201
Phone: (803) 898-0290
E-Mail: scaturdm@dhec.sc.gov

The draft permit, permit application and other related information are available for review through **February 2, 2015**, at the SCDHEC Columbia Office listed above and at the following locations:

SC DHEC
Midlands EQC Aiken
206 Beaufort Street, NE
Aiken, SC 29801
Phone: (803) 642-1637

SC DHEC
Lowcountry EQC Charleston – McMillan
1362 McMillan Avenue, Suite 300
Charleston, SC 29405
Phone: (843) 953-0150

The draft permit, fact sheet and the public notice may be viewed on SCDHEC's Website at:

<http://www.scdhec.gov/Apps/Environment/PublicNotices/>.

Anyone who would like to be placed on SCDHEC's mailing list to receive future hazardous waste public notices concerning this facility should submit a written request to the attention of Ms. Norma West at the above SCDHEC address in Columbia or by e-mail at: westnj@dhec.sc.gov.

VI. Procedure for Reaching a Final Permit Decision

All written comments received by **February 2, 2015** will be considered before a final permit decision is made.

Once SCDHEC makes a final permit decision, notification will be provided to:

- The facility;
- Each person who submitted written comments; and
- Anyone who has requested to receive notice of the final permit decision.

Any affected person who wishes to appeal a SCDHEC final permit decision may do so by filing a written request for final review with SCDHEC's Clerk of the Board within fifteen days after the notice of the decision has been mailed.

Additional information regarding appeal procedures is available from SCDHEC's Clerk of the Board at the above SCDHEC address in Columbia or by calling (803) 898-3309.

VII. Summary of Draft Permit Conditions

The draft hazardous waste permit issued by SCDHEC is divided into nine modules. Please note EPA's draft HSWA permit is divided into three sections, all of which are included in SCDHEC's hazardous waste draft permit. Each module and a brief explanation of the permit conditions for that module are listed in the table below. The regulation that governs the condition(s) is also listed.

SCDHEC Module I EPA HSWA Part I	Standard Conditions	This section defines and contains standard administrative conditions that apply to all hazardous waste management facilities. (<i>R.61-79.270.30</i>) (EPA 40 CFR §§ 63, 124, 260-270)
SCDHEC Module II EPA HSWA Part II	General Facility Conditions	Conditions apply to all facilities that treat, store or dispose of hazardous waste. (<i>R.61-79.264</i>) (EPA 40 CFR §§ 264, 270)
SCDHEC Module III	Containers	This section defines the requirements of operating and closing the Hazardous Waste Container Storage Areas (6100, 7100, 9100 and RL01). A chart is included in this section that identifies the types of wastes that can be stored in certain containers, the location for those containers and maximum quantity allowed. It contains general information along with schedules and required documents to be maintained by the facility. (<i>R 61-79.264</i>)
SCDHEC Module IV	Tank Storage	This section defines the requirements of operating and closing the Hazardous Waste Derived Fuel (HWDF) storage tanks. A chart is included in this section that identifies each tank with its capacity as well as other information for each tank. It contains general information along with schedules and required documents to be maintained by the facility. (<i>R 61-79.264</i>)
SCDHEC Module V EPA HSWA Part III	Industrial Furnace Requirements	Conditions listed in Module V are to ensure that the operation, maintenance, and closure of the hazardous waste burning Portland Cement kiln system, one direct burn area and management of residues from the kiln system are in compliance with the applicable regulations, R. 61-79.266 and 270.66. The Permittee will be required to comply with all current applicable South Carolina Hazardous Waste Management Regulations (SCHWMR) and subsequent revisions. Certain provisions of these regulations overlap the requirements promulgated under the authority of the Clean Air Act. In an effort to comply with preamble discussion of the Hazardous Waste Combustor Maximum Achievable Control Technology provisions that stated the desire was to avoid duplication between the Clean Air Act and RCRA, this Module of the permit once contained "sunset" provisions to retire certain duplicative RCRA requirements. This "sunset" occurred on June 28, 2004, the postmark date of a Notification of Compliance documenting compliance with the 40 CFR § 63 Subpart EEE requirements by Holcim. As a result, the duplicative conditions have been removed from this permit. (EPA 40 CFR §§ 63, 263-270, Subpart HH)

SCDHEC Module VI	Corrective Action for Solid Waste Management Units & Areas of Concern	<p>This section requires the facility to implement corrective action measure(s), when necessary. (R.61-79.264)</p> <p>The objective of the corrective action program at a hazardous waste management facility is to evaluate the nature and extent of releases of hazardous waste and/or constituents and, if necessary, to put corrective measures in place that will protect human health and the environment.</p>
SCDHEC Module VII	Waste Minimization	<p>Conditions require that the facility has a program in place to reduce the volume and toxicity of hazardous waste generated and that the treatment, storage or disposal method minimizes present and future threat to human health and the environment.</p> <p><i>These conditions are governed by Section 44-56-170(A) of the 1976 South Carolina Code of Laws, as amended.</i></p>
SCDHEC Module VIII	Land Disposal Restrictions	<p>Conditions ensure that restricted waste was/is not disposed in a land-based unit or otherwise managed unless certain requirements are met. (R.61-79.268)</p>
SCDHEC Module IX	RCRA Organic Air Emissions Control	<p>Conditions ensure that organic air emissions from hazardous waste containers and tanks are limited in accordance with R. 61-79.264 Subpart CC.</p>

Additional information can be found in the draft permit and the facility's permit application.